

**BARRACK, RODOS & BACINE**

SAMUEL M. WARD (216562)

One America Plaza

600 West Broadway, Suite 900

San Diego, CA 92101

Telephone: (619) 230-0800

Facsimile: (619) 230-1874

[sward@barrack.com](mailto:sward@barrack.com)

*Counsel for Local 580 Insurance Fund*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☒ Affects Both Debtors  
☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF LOCAL 580 INSURANCE  
FUND TO SECURITIES LEAD PLAINTIFF'S  
OBJECTION TO REORGANIZED  
DEBTORS' MOTION TO APPROVE  
SECURITIES ADR AND RELATED  
PROCEDURES FOR RESOLVING  
SUBORDINATED SECURITIES CLAIMS  
[D.I. 9189]**

1 Local 580 Insurance Fund, the holder of a Securities Claim<sup>1</sup> and a creditor in the chapter  
2 11 bankruptcy cases (the “**Chapter 11 Cases**”) of the above-captioned reorganized debtors (the  
3 “**Debtors**”, or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”), by and through  
4 its undersigned counsel, submits this joinder (“**Joinder**”) to *Securities Lead Plaintiff’s Objection*  
5 *to Reorganized Debtors’ Motion to Approve Securities ADR and Related Procedures for*  
6 *Resolving Subordinated Securities Claims* [Docket No. 9189] (the “**Securities ADR**  
7 **Objection**”), in opposition to *Reorganized Debtors’ Motion to Approve Securities ADR and*  
8 *Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 8964] (the  
9 “**Securities ADR Motion**”). In support of this Joinder, Local 580 Insurance Fund, respectfully  
10 states as follows:

11 **JOINDER AND RESERVATION OF RIGHTS**

- 12
- 13 1. Local 580 Insurance Fund is a Securities Claimant and timely filed proofs of claim  
14 against the Debtors by the Extended Bar Date (Claim Nos. CCMOY27423 and PAUT@27423).
  - 15 2. Local 580 Insurance Fund incorporates by reference and hereby joins in all  
16 arguments set forth in the Securities ADR Objection.
  - 17 3. Local 580 Insurance Fund reserves its rights to supplement this Joinder and further  
18 reserves its rights to participate in any hearing to consider the Securities ADR Motion, including  
19 its rights to make any arguments and to examine witnesses.
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26 <sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities  
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as  
28 applicable.

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**CONCLUSION**

For all of the foregoing reasons, Local 580 Insurance Fund respectfully requests that this Court enter an Order denying the Securities ADR Motion and granting such other and further relief as may be just and proper.

Dated: October 6, 2020

**BARRACK, RODOS & BACINE**

By: /s/ Samuel M. Ward  
Samuel M. Ward (216562)  
One America Plaza  
600 West Broadway, Suite 900  
San Diego, CA 92101  
Telephone: (619) 230-0800  
Facsimile: (619) 230-1874  
[sward@barrack.com](mailto:sward@barrack.com)

*Counsel for Local 580 Insurance Fund*